



September 9, 2005

Matt McClincy  
Voluntary Cleanup and Site Assessment Section  
Oregon Department of Environmental Quality  
2020 SW 4th Avenue, Suite 400  
Portland, OR 97201-4987

Re: Meeting Decisions and Response to Source Control Letters

Dear Matt:

Thank you for your clarifying letters on Source Control for the Gasco and Siltronic sites. I appreciate you and your team making time to meet with us on short notice to discuss schedules and prioritization. As you know, the Gasco tar deposit early action is underway, and occupying both resources and much of the physical footprint of the in water work area for the pending in water source control investigations. This letter provides our understanding of the resolutions we reached regarding the implementation schedule for the approach DEQ has provided for both Gasco and Siltronic.

The approach we discussed is that NW Natural will collect groundwater and transition zone water data from the aquifer beneath the river in order to better understand the hydraulics and plume delineation within this system. Also, Hahn and Associates, Inc. (HAI) has recently installed a new large diameter pumping well and observation well for the completion of aquifer testing activities near the shoreline at Gasco for further refinement of our understanding of aquifer properties. These testing activities were initiated the week of August 22, 2005 (step test) and will continue through the week of August 29, 2005 (constant rate test). The data derived from these tests will be of great value as NW Natural proceeds with the Focused Feasibility work for DEQ.

Based on the approach and understanding as discussed during the August 19, 2005 meeting, NW Natural agreed to prepare a schedule to address a source control Focused Feasibility Study related to the Gasco and Siltronic investigations, in conjunction with other on-going tasks (tar deposit removal and aquifer testing activities). The attached table presents the proposed schedule for the following:

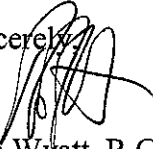
- The Gasco MW-16 area DNAPL source control Focused Feasibility technology screen submittal.
- Gasco and Siltronic groundwater source control Focused Feasibility technology screen submittal. Completion of this Focused Feasibility work would occur subsequent to completion of off-shore plume delineation work (identified below).

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- Preparation of an off-shore groundwater source control investigation work plan. The work plan will provide a review of currently available off-shore sediment data (including the pending Siltronic data we discussed during our meeting). NW Natural understands that DEQ has directed us to also include a comparison of existing groundwater data to the screening level values (SLVs) DEQ has provided.
- Preparation of a NAPL data gap report to evaluate what additional investigations may be necessary to further refine the understanding of the nature and extent and mobility of NAPL, as well as the issue DEQ raised regarding the potential connectivity with the river for the Gasco and Siltronic properties.
- Also included are schedules for completion of aquifer testing activities and for the physical tar deposit removal activities currently ongoing near the shoreline at Gasco.

Matt, my project team and I look forward to working with DEQ on these issues.

Sincerely,



Bob Wyatt, R.G.  
Environmental Compliance Specialist

cc: Rod Struck, DEQ NWR  
Heidi Blishke, DEQ NWR  
Carl Stivers, Anchor  
Rob Ede, Hahn and Associates  
Patty Dost, Schwabe Williamson & Wyatt

## Draft Source Control Activity Related Schedule

		2005																	
		September				October					November				December				
Activity		5-Sep	12-Sep	19-Sep	26-Sep	3-Oct	10-Oct	17-Oct	24-Oct	31-Oct	7-Nov	14-Nov	21-Nov	28-Nov	5-Dec	12-Dec	19-Dec	26-Dec	
1a	Gasco MW-16 Area DNAPL Source Control Focused Feasibility Technology Screen Submittal																		
1b	DEQ Review																		
1c	DNAPL Source Control Focused Feasibility Study																		
2	Gasco Pumping Well PW-1 Aquifer Test Reporting																		
3a	Gasco and Siltronic Groundwater Source Control Focused Feasibility Technology Screens																		
3b	DEQ Review																		
3c	Groundwater Source Control Focused Feasibility (After completion of Task 4)																		
4	Physical Offshore Tar Deposit Removal																		
5a	Gasco and Siltronic Summary of Available Off-Shore Data, Groundwater SLV Screen, and Work Plan for Off-Shore Plume Delineation																		
5b	DEQ Review																		
5c	Field Implementation																		
5	Gasco and Siltronic DNAPL CSM / Data Gap Report(s)																		

CSM = conceptual site model

DNAPL = dense non-aqueous phase liquid

SLV = screening level value

Deliverable = \*

Activity 1a Completion Date= September 26, 2005

Activity 2 Completion Date= October 14, 2005

Activity 3a Completion Date=October 14, 2005

Activity 4a Completion Date=October 14, 2005

Activity 5 Completion Date=October 14, 2005